



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
www.epa.gov/region8

Ref: 8ENF-W-SDW

OCT 25 2016

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Troy Matthews, Production Engineer  
Phoenix Production Company  
225 W Yellowstone  
P.O. Box 2653  
Cody, Wyoming 81414

Re: Underground Injection Control (UIC); Notice of Violation: Loss of Mechanical Integrity for the 2-WO3 Well (EPA Well ID # WY20000-02127, API # 49-013-06618) – Rolff Lake Oil Field, Fremont County, Wyoming

Dear Mr. Matthews:

On October 11, 2016, the Environmental Protection Agency learned by mail that the Phoenix Production Company injection well referenced above failed a mechanical integrity test on September 29, 2016. Pursuant to Title 40 of the Code of Federal Regulations Section 144.28(f)(2) (40 C.F.R. § 144.28(f)(2)), you must establish and maintain mechanical integrity. A loss of mechanical integrity is a violation of this requirement.

Pursuant to 40 C.F.R. § 144.28(f)(3), you must immediately cease injection into this well. Before injection may resume, you must demonstrate that the well has mechanical integrity by passing a mechanical integrity test (MIT). You must also receive written authorization from the EPA.

Within thirty (30) days of receipt of this letter, please submit a letter describing what action you intend to take regarding the well, including a time frame in which you anticipate the work to be completed. It is expected that you will return this well to compliance within ninety (90) days of the loss of mechanical integrity. If you choose to plug and abandon this well, a plugging and abandonment plan must be submitted to the EPA for approval prior to the plugging operation.

Any failure to comply with the UIC regulations found at 40 C.F.R. parts 144, 146, and 148 is subject to enforcement by the EPA, as provided in section 1423 of the Safe Drinking Water Act, 42 U.S.C. § 300(h)(2).

If you have any questions concerning this letter, you may contact Gary Wang at (303) 312-6469. Please direct all correspondence to the attention of Gary Wang at Mail Code 8ENF-W-SDW.

Sincerely,

Suzanne J. Bohan  
Assistant Regional Administrator  
Office of Enforcement, Compliance  
and Environmental Justice

cc: Darwin St. Clair, Chairman  
Eastern Shoshone Tribe

Dean Goggles, Chairman  
Northern Arapaho Tribe

Lokilo St. Clair, Acting Director  
Wind River Environmental Quality Commission

A handwritten signature in dark ink, appearing to be "Lokilo St. Clair", is located at the bottom center of the page. The signature is stylized and somewhat cursive.